

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
DEADLINE FOR SUBMITTING
DECLARATIONS PURSUANT TO L.R.
79-5(e)(1)**

This Document Relates to:

ALL ACTIONS

1 The parties jointly stipulate and agree, subject to the Court's approval, to a modest extension
 2 of the deadline for filing Declarations Pursuant to Local Rule 79-5(e)(1) in support of sealing
 3 portions of the Second Amended Consolidated Class Action Complaint, which was filed on
 4 November 13, 2020, and the Second Amended Government Entity Complaints, which were filed
 5 on November 12, 2020.

6 WHEREAS, the Second Amended Consolidated Class Action Complaint is 710 pages and
 7 3,570 paragraphs in length, and includes at least 150 paragraphs referencing materials that are
 8 marked Confidential or Highly Confidential (Dkt. 1135);

9 WHEREAS, Plaintiffs filed seven second amended bellwether government entity
 10 complaints (*Central Bucks School District, Bucks County, Pennsylvania v. JUUL Labs, Inc. et al.*,
 11 Case No. 3:19-cv-08023-WHO, Dkt. 20; *The School Board of Escambia County, Florida, et al. v.*
 12 *JUUL Labs, Inc., et al.*, Case No. 3:20-cv-00459-WHO, Dkt. 36; *The Livermore Valley Joint*
 13 *Unified School District v. JUUL Labs, Inc., et al.*, Case No. 3:19-cv-08176-WHO, Dkt. 21; *County*
 14 *of Santa Cruz, Individually And on Behalf of The People of The State of California v. JUUL Labs,*
 15 *Inc., et al.*, Case No. 3:20-cv-02261-WHO, Dkt. 29; *The School Board of Broward County, Florida*
 16 *v. JUUL Labs, Inc., et al.*, Case No. 3:19-cv-08289-WHO, Dkt. 20; *Three Village Central School*
 17 *District v. JUUL Labs, Inc., et al.*, Case No. 3:19-cv-07028-WHO, Dkt. 25; *Tucson Unified School*
 18 *District v. JUUL Labs, Inc., et al.*, Case No. 3:19-cv-07335-WHO, Dkt. 25) ("Second Amended
 19 Government Entity Complaints") on November 12, 2020, each of which exceeds 300 pages and
 20 references materials marked Confidential or Highly Confidential;

21 WHEREAS, the process of reviewing the cited Confidential or Highly Confidential material
 22 and ensuring compliance with the relevant sealing procedures for this material is extraordinarily
 23 time-consuming, and counsel requires additional time to coordinate with Defendants to narrowly
 24 tailor the material Defendants seeks to seal and to ensure it complies with any applicable
 25 confidentiality obligations to third parties;

26 WHEREAS the parties have not previously requested an extension of these deadlines;
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1 WHEREAS, allowing additional time to submit Rule 79-5 declarations will allow those
2 declarations to be tailored to the complaints, which will be more efficient and reduce redundancy
3 and burden on the Court;

4 WHEREAS, the parties met and conferred and have agreed, subject to the Court's approval,
5 that the deadline for filing Declarations Pursuant to Local Rule 79-5(e)(1) in support of sealing
6 portions of the Second Amended Consolidated Class Action Complaint and the Second Amended
7 Government Entity Complaints should be extended to December 16, 2020 to provide additional
8 time for Defendants to review the complaints, to ensure compliance with the relevant sealing
9 procedures and standards, and to focus the declarations on the operative complaints;

10
11 **NOW THEREFORE**, the parties, through their undersigned counsel, hereby stipulate,
12 agree and respectfully request that the Court enter an Order establishing December 16, 2020 as the
13 deadline for filing Declarations Pursuant to Local Rule 79-5(e)(1) in support of sealing portions of
14 the Second Amended Consolidated Class Action Complaint and the Second Amended Government
15 Entity Complaints.

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1 Dated: November 16, 2020

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1 PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING, IT IS SO ORDERED:

2 The deadline for filing Declarations Pursuant to Local Rule 79-5 in connection with the
3 Second Amended Consolidated Class Action Complaint and the Second Amended Government
4 Entity Complaints shall be extended to **December 16, 2020**.

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7 Date: November 17, 2020


HONORABLE WILLIAM H. ORRICK
United States District Judge

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